

1 MARCUS LEE (NV Bar No. 15769)
2 INKU NAM (NV Bar No. 12050)
2 LEWIS BRISBOIS BISGAARD & SMITH LLP
3 6385 S. Rainbow Boulevard, Suite 600
4 Las Vegas, Nevada 89118
Telephone: 702.893.3383
Facsimile: 702.893.3789
Marcus.Lee@lewisbrisbois.com
Inku.Nam@lewisbrisbois.com

6 *Attorneys for Bridgestone HosePower, LLC*

7 UNITED STATES DISTRICT COURT

8 DISTRICT OF NEVADA

10 BRIDGESTONE HOSEPOWER, LLC, a
Foreign Limited-Liability Company;

11 Plaintiff,

12 vs.
13 CHRISTOPHER M. EISMANN, an
individual; DOES 1 – 20, Inclusive; ROE
CORPORATIONS, 1 – 20, Inclusive.

14 Defendants.

15 Case No. 2:21-cv-02121-GMN-EJY

16 **STIPULATION AND ORDER TO
EXTEND REPLY DEADLINE**

17 **(Amended Second Request)**

18 IT IS HEREBY STIPULATED AND AGREED, by and between Marcus J. Lee, Esq. of
19 Lewis Brisbois Bisgaard & Smith, LLP, counsel for Plaintiff Bridgestone Hosepower, LLC
20 (“Plaintiff”), and Mark Albright, Esq. of the Albright Stoddard Warnick & Albright, counsel for
21 Defendant Christopher M. Eismann (“Defendant”), that:

22 1. The due date for Plaintiff’s Reply to Defendant’s Response (ECF No. 21) to
23 Plaintiff’s Motion for Preliminary Injunction (ECF No. 20) was extended from February 14, 2022
24 to February 18, 2022 pursuant to the Court’s order granting the parties’ stipulation (ECF No 23).

25 2. The Plaintiff and Defendant hereby further stipulate to extend the due date for
26 Plaintiff’s Reply to Defendant’s Response (ECF No. 21) to Plaintiff’s Motion for Preliminary
27 Injunction (ECF No. 20) from February 18, 2022 to March 4, 2022.

1 This is Defendant and Plaintiff's second request to extend this deadline, which is made in
2 good faith and not for purposes of delay. Pursuant to Local Rule IA 6-1(a), the parties are engaged
3 in good faith settlement negotiations that are being made for the purpose of resolving all disputes
4 raised by Plaintiff in this action.

5 DATED this 18th day of February, 2022.

6 DATED this 18th day of February, 2022

7 Albright Stoddard Warnick & Albright

8 Lewis Brisbois Bisgaard & Smith LLP

9 */s/ Mark Albright*

10 By: _____
11 */s/ Marcus Lee*

12 By: _____
13 Mark Albright
14 Albright Stoddard Warnick & Albright
15 801 South Rancho Dr., Ste. D4
16 Las Vegas, NV 89106
17 Attorneys for Defendant

18 By: _____
19 MARCUS LEE
20 Nevada Bar No. 15769
21 INKU NAM
22 Nevada Bar No. 12050
23 LEWIS BRISBOIS BISGAARD &
24 SMITH LLP
25 6385 S. Rainbow Boulevard, Suite 600
26 Las Vegas, Nevada 89118
27 Attorneys for Plaintiff

18 **IT IS SO ORDERED:**

19 Dated this 18th day of February 2022.

20 
21 Clayton J. Zouchal
22 UNITED STATES MAGISTRATE JUDGE